

ORIGINAL

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Inquiry Concerning the Deployment of)
Advanced Telecommunications)
Capability to All Americans in a Reasonable)
and Timely Fashion, and Possible Steps)
to Accelerate Such Deployment)
Pursuant to Section 706 of the)
Telecommunications Act of 1996)

CC Docket 98-146

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Comments of Network Plus, Inc.

Network Plus, Inc. ("Network Plus") respectfully submits the following comments in response to the Notice of Inquiry ("NOI") issued in the above-captioned proceeding.¹

Section 706 of the Telecommunications Act of 1996 ("1996 Act") requires the FCC to initiate a NOI concerning the availability of advanced telecommunications capability ("ATC") and to determine whether ATC is being deployed to all Americans in a reasonable and timely fashion. An important purpose of the NOI is to collect information regarding which service providers have deployed ATC (or are planning to deploy ATC) and which Americans are being afforded the opportunity to purchase ATC. Network Plus therefore files these comments to make the FCC aware of its plans to offer ATC and enhanced services to its customers. Although Network Plus does not at this time comment on the deployment of ATC by other competitive carriers or incumbent carriers, the definition of ATC, what constitutes reasonable and timely deployment of ATC, or what actions

¹ *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996*, CC Docket No. 98-146, Notice of Inquiry, FCC 98-187 (rel. Aug. 7, 1998) ("NOI").

the FCC should take to remove barriers to deployment, Network Plus reserves its right to address such issues raised by other commentors in its reply comments.

Network Plus, founded in 1990, is a leading facilities-based integrated communications provider offering switched long distance, data and enhanced telecommunications services. Network Plus is authorized to provide intrastate long distance services in 49 states and its application to provide intrastate long distance in Alaska is currently pending. The Company's customers consist primarily of small and medium-sized businesses located in major markets in the Northeast (the New England states, New York and New Jersey) and Southeast (Florida, Georgia, North Carolina, South Carolina and Tennessee). Network Plus also provides international wholesale transport and termination services to major domestic and international telecommunications carriers. As of July 15, 1998, the Company served over 34,000 customers representing in excess of 150,000 access lines and 30,000 toll-free numbers.

Network Plus intends to offer local services on a commercial basis beginning in the third quarter of 1998 and intends to add Internet services to its offerings in the later part of 1998. Network Plus has received authorization to provide competitive local exchange ("CLEC") services in Massachusetts and Rhode Island and has filed applications for CLEC authority in Connecticut, Florida, Georgia, Maine, New Hampshire, New Jersey, New York, Pennsylvania, Tennessee, and Vermont. The Company has initiated interconnection negotiations with the incumbent LECs in the states where it will offer local exchange services and intends to provide its local services via resale initially, eventually transitioning its customers to the Company's own network. Network Plus also

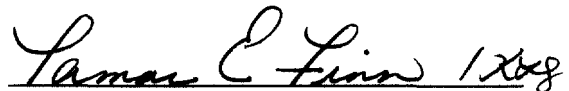
plans to expand its customer base to the work-at-home market and other residential customers. xDSL services will be an important service offering for both Network Plus' business and residential customers.

Network Plus pursues a capital-efficient network deployment strategy that involves purchasing switches and acquiring or leasing fiber optic transmission facilities on an incremental basis to satisfy customer demand. In addition to 625 route miles of dark fiber, Network Plus currently owns and maintains a Northern Telecom, Inc. ("Nortel") international gateway and an interexchange switch in Quincy, Massachusetts and a Nortel interexchange switch in Orlando, Florida. Network Plus also recently signed a 20-year, \$10 million contract with Northeast Optical Network, Inc. ("NEON") to purchase high capacity dark fiber on a route linking Boston, New York, Hartford, and other points in New England to help it optimize service in the northeast corridor. Network Plus will physically collocate at ILEC central offices in order to purchase unbundled local loops and combine the loops and other ILEC facilities with the Company's own facilities. Thus the Company will be, for the foreseeable future, dependent upon ILECs for access to the "last mile" to reach consumers.

Conclusion

Network Plus appreciates the opportunity to inform the FCC of the ATC and enhanced services it plans to make available to its customers and looks forward to working with the FCC to ensure that ATC is deployed to all Americans.

Respectfully submitted,

A handwritten signature in cursive script, reading "Tamar E. Finn 12/98".

Andrew D. Lipman

Tamar E. Finn

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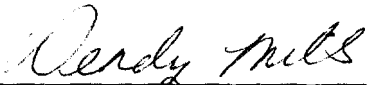
September 14, 1998

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of September, 1998, a copy of the foregoing *Comments of Network Plus, Inc.*; CC Docket No. 98-146 was delivered to:

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